

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

JOSHUA WARREN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MOUNT ETNA PARTNERS, LLC,	)	CASE NO: 3:21-cv-05091-MDH
RONALD BLACKBURN and	)	
GARRETT REINCKE,	)	
	)	
Defendants.	)	

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE  
OF RONALD BLACKBURN PURSUANT TO RULE 41(a)(1)(A)**

COMES NOW Plaintiff Joshua Warren, by and through his counsel of record, and pursuant to Federal Rule of Civil Procedure files her Notice of Voluntary Dismissal Without Prejudice of Ronald Blackburn, and in support states as follows:

1. Ronald Blackburn has not been served with the Complaint and therefore no Answer has been filed.

2. Under Rule 41(a)(1)(i), a Notice of Dismissal without order of Court is sufficient to effect dismissal.

3. This Notice of Dismissal does not affect the other Defendants, Mount Etna Partners, LLC, and Garrett Reincke, which will remain pending.

WHEREFORE, Plaintiff prays for an order of dismissal without prejudice of Ronald Blackburn pursuant to Rule 41(a)(1)(A), and for such other and further relief as this Court deems just and proper in the circumstances.

Respectfully submitted,

**BUCHANAN, WILLIAMS & O'BRIEN, P.C.**

/s/ James V. O'Brien

James V. O'Brien, MO Bar #31161

Andrew S. Buchanan, MO Bar #53824

1105 E 32nd St., Ste 5

Joplin, MO 64804

Telephone: 417-623-8220

Facsimile: 417-781-9706

E-Mail: [jobrien@bwoattorneys.com](mailto:jobrien@bwoattorneys.com)

[abuchanan@bwoattorneys.com](mailto:abuchanan@bwoattorneys.com)

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was sent via the Court's electronic filing system, this 6<sup>th</sup> day of July, 2023 and via US Mail to:

Garrett Reincke  
10714 Lake Alice Cove  
Odessa, FL 33556

/s/ James V. O'Brien